



**AIR POLLUTION CONTROL DISTRICT OF JEFFERSON COUNTY, KENTUCKY**  
**TITLE V OPERATING PERMIT**

Permit No.: 92-97-TV

Plant ID: 0223

Effective Date: 23 January 2001

Expiration Date: 23 January 2001

UTM Northing: 4230.6

UTM Easting: 625.6

SIC: 4922

NAICS: 48621

AFS: 00223

Permission is hereby given by the Air Pollution Control District of Jefferson County to operate equipment located at:

**Texas Gas Transmission Corporation**  
**10327 Gaslight Way**  
**Louisville, KY 40299-2587**

in accordance with the permit application on file with the District and under the conditions in the permit. This permit and the authorization to operate the emission units listed shall expire on midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the owner or operator may continue to operate in accordance with the terms and conditions of this permit beyond the expiration date, provided that a complete renewal application is submitted to the District no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Applicant for Permit: Texas Gas Transmission Corp.

Responsible Official: Jack Ralph

Title of Responsible Official: Vice President

Date Application Received: 15 December 1994

Date Application Administratively Complete: 1 July 1995

Date Public Notice Given: 12 March 2000

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Reviewing Engineer (61)

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Air Pollution Control Officer

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### Abbreviations and Acronyms

AC	- Additional Condition
AFS	- AIRS Facility Subsystem
AIRS	- Aerometric Information Retrieval System
APCD	- Air Pollution Control District
ASL	- Adjusted Significant Level
atm	- Atmosphere
BACT	- Best Available Control Technology
Btu	- British Thermal Unit
EC	- Degrees Centigrade
CEMS	- Continuous Emission Monitoring System
CAAA	- Clean Air Act Amendments (15 November 1990)
cf	- Cubic foot
DOE	- District Only Enforceable
EF	- Degrees Fahrenheit
gal	- Gallon
HAP	- Hazardous Air Pollutant
Hg	- Mercury
hr	- hour
lbs	- Pounds
l	- Liter
MACT	- Maximum Achievable Control Technology
m	- Meter
mg	- Milligram
mm	- Millimeter
MM	- Million
MOCS	- Management of Change System
NAICS	- North American Industry Classification System
NSR	- New Source Review
NO <sub>x</sub>	- Nitrogen oxides
NSPS	- New Source Performance Standards
PM	- Particulate Matter
PM <sub>10</sub>	- Particulate matter less than 10 microns
ppm	- Parts per million
PSD	- Prevention of Significant Deterioration
PMP	- Preventive Maintenance Plan
psia	- Pounds per square inch absolute
RACT	- Reasonably Available Control Technology
SIC	- Standard Industrial Classification
SIP	- State Implementation Plan
SO <sub>2</sub>	- Sulfur dioxide
TAL	- Threshold Ambient Limit
TAP	- Toxic Air Pollutant
tpy	- Tons per year
VOC	- Volatile Organic Compound
UTM	- Universal Transverse Mercator

### **Preamble**

Title V of the Clean Air Act Amendments of 1990 required EPA to create an operating permit program for implementation by state or local air permitting authorities. The purposes of this program are (1) to require an affected company to assume full responsibility for demonstrating compliance with applicable regulations; (2) to capture all of the regulatory information pertaining to an affected company in a single document; and (3) to make permits more consistent with each other.

A company is subject to the Title V program if it meets any of several criteria related to the nature or amount of its emissions. The Title V operating permit specifies what the affected company is, how it may operate, what its applicable regulations are, how it will demonstrate compliance, and what is required if compliance is not achieved. In Jefferson County, Kentucky, the Air Pollution Control District (APCDJC) is responsible for issuing Title V permits to affected companies and enforcing local regulations and delegated federal and state regulations. EPA may enforce federal regulations but not "District Only Enforceable Regulations".

Title V offers the public an opportunity to review and comment on a company's draft permit. It is intended to help the public understand the company's compliance responsibility under the Clean Air Act. Additionally, the Title V process provides a mechanism to incorporate new applicable requirements. Such requirements are available to the public for review and comment before they are adopted.

Title V Permit general conditions define requirements which are generally applicable to all Title V companies under the jurisdiction of APCDJC. This avoids repeating these requirements in every section of the company's Title V permit. Company-specific conditions augment the general conditions as necessary; these appear in the sections of the permit addressing individual emission units or emission points.

The general conditions include references to regulatory requirements that may not currently apply to the company, but which provide guidance for potential changes at the company or in the regulations during the life of the permit. Such requirements may become applicable if the company makes certain modifications or a new applicable requirement is adopted.

When the applicability of a section or subpart of a regulation is unclear, a clarifying citation will be made in the company's Title V permit at the emission unit/point level. Comments may also be added at the emission unit/point level to give further clarification or explanation.

The source's Title V permit may include a list of "insignificant activities," which are activities or processes falling into the general categories defined in Regulation 2.02, Section 2, and not associated with a specific operation or process for which there is a specific regulation. Activities so identified may be insignificant with regard to application disclosure requirements but may still have generally applicable requirements that continue to apply and must be included in the Title V operating permit. No periodic monitoring shall be required for facilities designated as insignificant activities.

### General Conditions

1. **Compliance** - The owner or operator shall comply with all applicable requirements and with all terms and conditions of this permit. Any noncompliance shall constitute a violation of the Act, State and District regulations and shall cause the source to be subject to enforcement actions including, but not limited to, the termination, revocation and reissuance, or revision of this permit, or denial of a permit application to renew this permit. Notwithstanding any other provision in the Jefferson County portion of the Kentucky SIP approved by EPA, any credible evidence may be used for the purpose of establishing whether the owner or operator is in compliance with, has violated, or is in violation of any such plan. (Regulation 2.16, sections 4.1.3, 4.1.13.1 and 4.1.13.7)
2. **Compliance Certification** - The owner or operator shall certify, annually or more frequently if required in applicable regulations, compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. This certification shall meet the requirements of Regulation 2.16, sections 3.5.11 and 4.3.5. The owner or operator shall submit the annual compliance certification directly to the following address as well as to the District, as set forth in Regulation 2.16, section 4.3.5.4:  
  

***US EPA - Region IV  
Air Enforcement Branch  
Atlanta Federal Center  
61 Forsyth Street  
Atlanta, GA 30303-8960***
3. **Compliance Schedule** - A compliance schedule must meet the requirements of Regulation 2.16, section 3.5.9.5. The owner or operator shall submit a schedule of compliance for each emission unit that is not in compliance with all applicable requirements. A schedule of compliance shall be supplemental to, and shall not condone noncompliance with, the applicable requirements on which it is based. For each schedule of compliance, the owner or operator shall submit certified progress reports at least semi-annually, or at a more frequent period if specified in an applicable requirement or by the District in accordance with Regulation 2.16 section 4.3.4. The progress reports shall contain:
  - a. Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when activities, milestones, or compliance were achieved.
  - b. An explanation of why dates in the schedule of compliance were not or will not be met, and preventive or corrective measures adopted.
4. **Duty to Supplement or Correct Application** - If the owner or operator fails to submit relevant facts or has submitted incorrect information in the permit application, it shall, upon discovery of the occurrence, promptly submit the supplementary facts or corrected information in accordance with Regulation 2.16, section 3.4.
5. **Emergency Provision**

- a. An emergency shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emission limitations. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
    - i. An emergency occurred and that the owner or operator can identify the cause of the emergency.
    - ii. The permitted facility was at the time being properly operated.
    - iii. During the period of the emergency the owner or operator expeditiously took all reasonable steps, consistent with safe operating practices, to minimize levels of emissions that exceeded the emission standards or other requirements in this permit.
    - iv. The owner or operator submitted notice meeting the requirements of Regulation 1.07 of the time when emissions limitations were exceeded because of the emergency. This notice must fulfill the requirement of this condition, and must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
  - b. In an enforcement proceeding, the owner or operator seeking to establish the occurrence of an emergency has the burden of proof.
  - c. This condition is in addition to any emergency or upset provision contained in an applicable requirement. (Regulation 2.16, sections 4.7.1 through 4.7.4)
6. **Emission Fees Payment Requirements** - The owner or operator shall pay annual emission fees in accordance with Regulation 2.08. Failure to pay the emissions fees when due shall constitute a violation of District Regulations. Such failure is subject to penalties and an increase in the fee of an additional 5% per month up to a maximum of 25% of the original amount due. In addition, failure to pay emissions fees within 60 days of the due date shall automatically suspend this permit to operate until the fee is paid or a schedule for payment acceptable to the District has been established. (Regulation 2.08, section 1.3)
7. **Emission Offset Requirements** - The owner or operator shall comply with the requirements of Regulation 2.04.
8. **Enforceability Requirements** - Except for the conditions that are specifically designated as "District Only Enforceable Conditions", all terms and conditions of this permit, including any provisions designed to limit a source's potential to emit, are enforceable by EPA and citizens as specified under the Act. (Regulation 2.16, sections 4.2.1 and 4.2.2)
9. **Enforcement Action Defense**



- a. It shall not be a defense for the owner or operator in an enforcement action that it would have been necessary for the owner or operator to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
  - b. The owner or operator's failure to halt or reduce activity may be a mitigating factor in assessing penalties for noncompliance if the health, safety or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operation. (Regulation 2.16, sections 4.1.13.2 and 4.1.13.3)
10. **Hazardous Air Pollutants and Sources Categories** - The owner or operator shall comply with the applicable requirements of Regulations 5.02 and 5.14.
11. **Information Requests** - The owner or operator shall furnish to the District, within a reasonable time, information requested in writing by the District, to determine whether cause exists for revising, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The owner or operator shall also furnish, upon request, copies of records required to be kept by this permit. (Regulation 2.16, section 4.1.13.6) If information is submitted to the District under a claim of confidentiality, the source shall submit a copy of the confidential information directly to EPA. (Regulation 2.07, section 10.2)
12. **Insignificant Activities** - The owner or operator shall notify the District in a timely manner of any proposed change to an insignificant activity that would require a permit revision. (Regulation 2.16, section 5)
13. **Inspection and Entry** - Upon presentation of credentials and other documents as required by law, the owner or operator shall allow the District or an authorized representative to perform the following during reasonable hours:
  - a. Enter the premises to inspect any emissions-related activity or records required in this permit.
  - b. Have access to and copy records required by this permit.
  - c. Inspect facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required by this permit.
  - d. Sample or monitor substances or parameters to assure compliance with this permit or any applicable requirements. (Regulation 2.16, section 4.3.2)
14. **Monitoring and Related Recordkeeping and Reporting Requirements** - The owner or operator shall comply with the requirements of Regulation 2.16, section 4.1.9. The owner or operator shall submit all required monitoring reports at least once every six months, unless more frequent reporting is required by an applicable requirement. The reporting period shall be January 1st through June 30th and July 1st through December 31st of each calendar year. All reports shall be postmarked by the 60th day following the end of each reporting period. If surrogate operating parameters are monitored and recorded in lieu of emission monitoring,

then an exceedance of multiple parameters may be deemed a single violation by the District for enforcement purposes.

15. **Off-permit Documents** - Any applicable requirements, including emission limitations, control technology requirements, or work practice standards, contained in an off-permit document cannot be changed without undergoing the permit revision procedures in Regulation 2.16, Section 5. (Regulation 2.16, section 4.1.5)
16. **Operational Flexibility** - The owner or operator may make changes without permit revision in accordance with Regulation 2.16, section 5.8.
17. **Permit Amendments (Administrative)** - This permit can be administratively amended by the District in accordance with Regulation 2.16, sections 2.3 and 5.4.
18. **Permit Application Submittal** - The owner or operator shall submit a timely and complete application for permit renewal or significant revision. If the owner or operator submits a timely and complete application then the owner or operator's failure to have a permit is not a violation until the District takes formal action on this permit application. This protection shall cease to apply if, subsequent to completeness determination, the owner or operator fails to submit, by the deadline specified in writing by the District, additional information required to process the application as required by Regulation 2.16, sections 3 and 5.2.
19. **Permit Duration** - This permit is issued for a fixed term of 5 years, in accordance with Regulation 2.16, section 4.1.8.3.
20. **Permit Renewal, Expiration and Application** - Permit renewal, expiration and application procedural requirements shall be in accordance with Regulation 2.16, sections 4.1.8.2 and 5.3. This permit may only be renewed in accordance with section 5.3.
21. **Permit Revisions** - No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in the permit. (Regulation 2.16, section 4.1.16)
22. **Permit Revision Procedures (Minor)** - Except as provided in 40 CFR Part 72, the Acid Rain Program, this permit may be revised in accordance with Regulation 2.16, section 5.5.
23. **Permit Revision Procedures (Significant)** - A source seeking to make a significant permit revision shall meet all the Title V requirements for permit applications, issuance and renewal, in accordance with Regulation 2.16, section 5.7, and all other applicable District Regulations.
24. **Permit Revocation and Termination by the District** - The District may terminate this permit only upon written request of the owner or operator. The District may revoke a permit for cause, in accordance with Regulation 2.16, section 5.11.1.1 through 5.11.1.5. For purposes of Section 5, substantial or unresolved noncompliance includes, but is not limited to:

- a. Knowingly operating process or air pollution control equipment in a manner not allowed by an applicable requirement or that results in excess emissions of a regulated air pollutant that would endanger the public or the environment.
  - b. Failure or neglect to furnish information, analyses, plans, or specifications required by the District.
  - c. Knowingly making any false statement in any permit application.
  - d. Noncompliance with Regulation 1.07, section 4.2; or
  - e. Noncompliance with KRS Chapter 77.
25. **Permit Shield** - The permit shield shall apply in accordance with Regulation 2.16, section 4.6.1.
26. **Prevention of Significant Deterioration of Air Quality** - The owner or operator shall comply with the requirements of Regulation 2.05.
27. **Property Rights** - This permit shall not convey property rights of any sort or grant exclusive privileges in accordance with Regulation 2.16, section 4.1.13.5.
28. **Public Participation** - Except for modifications qualifying for administrative permit amendments or minor permit revision procedures, all permit proceedings shall meet the requirements of Regulations 2.07, Section 1; and 2.16, sections 5.1.1.2 and 5.5.4.
29. **Reopening For Cause** - This permit shall be reopened and revised by the District in accordance with Regulation 2.16 section 5.9.
30. **Reopening for Cause by EPA** - This permit may be revised, revoked and reissued or terminated for cause by EPA in accordance with Regulation 2.16 section 5.10.
31. **Risk Management Plan (112(r))** - For each process subject to Section 112(r) of the Act, the owner or operator shall comply with 40 CFR Part 68 and Regulation 5.15.
32. **Severability Clause** - The conditions of this permit are severable. Therefore, if any condition of this permit, or the application of any condition of this permit to any specific circumstance, is determined to be invalid, the application of the condition in question to other circumstances, as well as the remainder of this permit's conditions, shall not be affected. (Regulation 2.16, section 4.1.12)
33. **Stack Height Considerations** - The owner or operator shall comply with the requirements of Regulation 2.10.
34. **Startups, Shutdowns, and Malfunctions Requirements** - The owner or operator shall comply with the requirements of Regulation 1.07.

35. **Submittal of Reports, Data, Notifications, and Applications**

- a. Applications, reports, test data, monitoring data, compliance certifications, and any other document required by this permit as set forth in Regulation 2.16 sections 3.1, 3.4, 3.5, 4.1.13.6, 5.8.5 and 5.11.7 shall be submitted to:

***Air Pollution Control District of Jefferson County  
850 Barret Ave  
Louisville, KY 40204-1745***

- b. Documents which are specifically required to be submitted to EPA as set forth in Regulation 2.16 sections 3.3, and 5.8.5 shall be mailed to EPA at the following address:

***US EPA - Region IV  
APTMD - 12th floor  
Atlanta Federal Center  
61 Forsyth Street  
Atlanta, GA 30303-3104***

36. **Other Applicable Regulations** - The owner or operator shall comply with all applicable requirements of the following regulations:

<b>FEDERALLY ENFORCEABLE REGULATIONS</b>	
<b>Regulation</b>	<b>Title</b>
1.01	General Application of Regulations and Standards
1.02	Definitions
1.03	Abbreviations and Acronyms
1.04	Performance Tests
1.05	Compliance with Emission Standards and Maintenance Requirements
1.06	Source Self-Monitoring and Reporting
1.07	Emissions During Startups, Shutdowns, Malfunctions, and Emergencies
1.08	Administrative Procedures
1.09	Prohibition of Air Pollution
1.10	Circumvention
1.11	Control of Open Burning
1.14	Control of Fugitive Particulate Emissions
2.01	General Application
2.02	Air Pollution Regulation Requirements and Exemptions
2.03	Permit Requirements - Non-Title V Construction and Operating Permits and Demolition/Renovation Permits

<b>FEDERALLY ENFORCEABLE REGULATIONS</b>	
<b>Regulation</b>	<b>Title</b>
2.07	Public Notification for Title V, PSD, and Offset Permits; SIP Revisions; and Use of Emission Reduction Credits
2.09	Causes for Permit Suspension
2.10	Stack Height Considerations
2.11	Air Quality Model Usage
2.16	Title V Operating Permits
4.01	General Provisions for Emergency Episodes
4.02	Episode Criteria
4.03	General Abatement Requirements
4.07	Episode Reporting Requirements
5.01	General Provisions (for Hazardous Air Pollutants)
5.03	Potential Hazardous Emissions
6.01	General Provisions (for <i>Existing Affected Facilities</i> )
6.02	Emission Monitoring for Existing Sources
7.01	General Provisions (for <i>New Affected Facilities</i> )

<b>DISTRICT ONLY ENFORCEABLE REGULATIONS</b>	
<b>Regulation</b>	<b>Title</b>
1.12	Control of Nuisances
1.13	Control of Objectionable Odors in the Ambient Air
2.08	Emissions Fees, Permit Fees, Permit Renewal Procedures, and Additional Programs Fees
8.03	Commuter Vehicle Testing Requirements

**Emission Unit U1 Description:** Compressor Engine #1

**Applicable Regulations :**

<b>Federally Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
6.42	Reasonably Available Control Technology Requirements for Major Volatile Organic Compound and Nitrogen Oxides Emitting Facilities	1, 2, 3, 4.3, 5

<b>District Only Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.11	Standards of Performance for Existing Sources Emitting Toxic Air Pollutants	1 through 6
5.14	Hazardous Air Pollutants and Source Categories	1, 2

**Allowable Emissions:**

<b>Pollutant</b>	<b>Limit/Standard</b>
NO <sub>x</sub>	See NO <sub>x</sub> RACT Plan, Regulation 6.42, section 4.3
TAP	< ASL, Regulation 5.11, Section 6

**Components:**

One engine (E1), rated capacity of 1500 bhp, installed in March, 1950. Vented out stack S1.

**Additional Conditions****1. Standards** (Regulation 2.16, section 4.1.1)a. **NO<sub>x</sub>** (Regulation 6.42, section 4.3)

The owner or operator shall comply with the NO<sub>x</sub> RACT Plan attached to this permit.

b. **TAPs** (Regulation 5.11, section 6)

The owner or operator shall comply with the RACT determination for formaldehyde emissions.

**2. Monitoring** (Regulation 2.16, section 4.1.9.1.2)a. **NO<sub>x</sub>**

The owner or operator shall comply with the NO<sub>x</sub> RACT Plan attached to this permit.

b. **TAP**

The owner or operator shall have a written maintenance program. The owner or operator shall follow a routine operation and preventive maintenance program to ensure optimum engine performance.

**3. Record Keeping** (Regulation 2.16, section 4.1.9.2)a. **NO<sub>x</sub>**

The owner or operator shall comply with the NO<sub>x</sub> RACT Plan attached to this permit.

b. **TAP**

The owner or operator shall keep records of when maintenance is performed; who performed the maintenance; and what the maintenance entailed.

**4. Reporting** (Regulation 2.16, section 4.1.9.3)

The owner or operator shall clearly identify all deviations from permit requirements in the quarterly reports. All reports shall be certified by a responsible official as defined in Regulation 2.16, section 2.36. If no deviations occur in that reporting period then the owner or operator shall report a negative declaration for each of the following categories. The owner or operator shall report quarterly the following:

a. **NO<sub>x</sub>**

The owner or operator shall comply with the NO<sub>x</sub> RACT Plan reporting requirements attached to this permit.

b. **TAP**

There are no compliance reporting requirements for this pollutant.

**Comment**

Additional Conditions 1.b, 2.b and 3.b are the RACT determination required for formaldehyde emissions from the engines and turbine by Regulation 5.11 and approved by the District.



**Emission Unit U2 Description:** Compressor Engine #2**Applicable Regulations:**

<b>Federally Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
6.42	Reasonably Available Control Technology Requirements for Major Volatile Organic Compound and Nitrogen Oxides Emitting Facilities	1, 2, 3, 4.3, 5

<b>District Only Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.11	Standards of Performance for Existing Sources Emitting Toxic Air Pollutants	1 through 6
5.14	Hazardous Air Pollutants and Source Categories	1, 2

**Allowable Emissions:**

<b>Pollutant</b>	<b>Limit/Standard</b>
NO <sub>x</sub>	See NO <sub>x</sub> RACT Plan, Regulation 6.42, section 4.3
TAP	< ASL, Regulation 5.11, Section 6

**Components:**

One engine (E2), rated capacity of 1500 bhp, installed in March, 1950. Vented out stack S2.

**Additional Conditions****1. Standards** (Regulation 2.16, section 4.1.1)a. **NO<sub>x</sub>** (Regulation 6.42, section 4.3)

The owner or operator shall comply with the NO<sub>x</sub> RACT Plan attached to this permit.

b. **TAP** (Regulation 5.11, section 6)

The owner or operator shall comply with the RACT determination for formaldehyde emissions.

**2. Monitoring** (Regulation 2.16, section 4.1.9.1.2)a. **NO<sub>x</sub>**

The owner or operator shall comply with the NO<sub>x</sub> RACT Plan attached to this permit.

b. **TAP**

The owner or operator shall have a written maintenance program. The owner or operator shall follow a routine operation and preventive maintenance program to ensure optimum engine performance.

**3. Record Keeping** (Regulation 2.16, section 4.1.9.2)a. **NO<sub>x</sub>**

The owner or operator shall comply with the NO<sub>x</sub> RACT Plan attached to this permit.

b. **TAP**

The owner or operator shall keep records of when maintenance is performed; who performed the maintenance; and what the maintenance entailed.

**4. Reporting** (Regulation 2.16, section 4.1.9.3)

The owner or operator shall clearly identify all deviations from permit requirements in the quarterly reports. All reports shall be certified by a responsible official as defined in Regulation 2.16, section 2.36. If no deviations occur in that reporting period then the owner or operator shall report a negative declaration for each of the following categories. The owner or operator shall report quarterly the following:

a. **NO<sub>x</sub>**

The owner or operator shall comply with the NO<sub>x</sub> RACT Plan reporting requirements attached to this permit.

b. **TAP**

There are no compliance reporting requirements for this pollutant.

**Comment**

Additional Conditions 1.b, 2.b, and 3.b are the RACT determination required for formaldehyde emissions from the engines and turbine by Regulation 5.11 and approved by the District.

**Emission Unit U3 Description:** Compressor Engine #3

**Applicable Regulations:**

<b>Federally Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
6.42	Reasonably Available Control Technology Requirements for Major Volatile Organic Compound and Nitrogen Oxides Emitting Facilities	1, 2, 3, 4.3, 5

<b>District Only Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.11	Standards of Performance for Existing Sources Emitting Toxic Air Pollutants	1 through 6
5.14	Hazardous Air Pollutants and Source Categories	1, 2

**Allowable Emissions:**

<b>Pollutant</b>	<b>Limit/Standard</b>
NO <sub>x</sub>	See NO <sub>x</sub> RACT Plan, Regulation 6.42, section 4.3
TAP	< ASL, Regulation 5.11, Section 6

**Components:**

One engine (E3), rated capacity of 1500 bhp, installed in March, 1950. Vented out stack S3.

**Additional Conditions****1. Standards** (Regulation 2.16, section 4.1.1)a. **NO<sub>x</sub>** (Regulation 6.42, section 4.3)

The owner or operator shall comply with the NO<sub>x</sub> RACT Plan attached to this permit.

b. **TAP** (Regulation 5.11, section 6)

The owner or operator shall comply with the RACT determination for formaldehyde emissions.

**2. Monitoring** (Regulation 2.16, section 4.1.9.1.2)a. **NO<sub>x</sub>**

The owner or operator shall comply with the NO<sub>x</sub> RACT Plan attached to this permit.

b. **TAP**

The owner or operator shall have a written maintenance program. The owner or operator shall follow a routine operation and preventive maintenance program to ensure optimum engine performance.

**3. Record Keeping** (Regulation 2.16, section 4.1.9.2)a. **NO<sub>x</sub>**

The owner or operator shall comply with the NO<sub>x</sub> RACT Plan attached to this permit.

b. **TAP**

The owner or operator shall keep records of when maintenance is performed; who performed the maintenance; and what the maintenance entailed.

**4. Reporting** (Regulation 2.16, section 4.1.9.3)

The owner or operator shall clearly identify all deviations from permit requirements in the quarterly reports. All reports shall be certified by a responsible official as defined in Regulation 2.16, section 2.36. If no deviations occur in that reporting period then the owner or operator shall report a negative declaration for each of the following categories. The owner or operator shall report quarterly the following:

a. **NO<sub>x</sub>**

The owner or operator shall comply with the NO<sub>x</sub> RACT Plan reporting requirements attached to this permit.

b. **TAP**

There are no compliance reporting requirements for this pollutant.

**Comment**

Additional Conditions 1.b, 2.b and 3.b are the RACT determination required for formaldehyde emissions from the engines and turbine by Regulation 5.11 and approved by the District.

**Emission Unit U4 Description:** Compressor Engine #4**Applicable Regulations:**

<b>Federally Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
6.42	Reasonably Available Control Technology Requirements for Major Volatile Organic Compound and Nitrogen Oxides Emitting Facilities	1, 2, 3, 4.3, 5

<b>District Only Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.11	Standards of Performance for Existing Sources Emitting Toxic Air Pollutants	1 through 6
5.14	Hazardous Air Pollutants and Source Categories	1, 2

**Allowable Emissions:**

<b>Pollutant</b>	<b>Limit/Standard</b>
NO <sub>x</sub>	See NO <sub>x</sub> RACT Plan, Regulation 6.42, section 4.3
TAP	< ASL, Regulation 5.11, Section 6

**Components:**

One engine (E4), rated capacity of 1500 bhp, installed in March, 1950. Vented out stack S4.

**Additional Conditions****1. Standards** (Regulation 2.16, section 4.1.1)a. **NO<sub>x</sub>** (Regulation 6.42, section 4.3)

The owner or operator shall comply with the NO<sub>x</sub> RACT Plan attached to this permit.

b. **TAP** (Regulation 5.11, section 6)

The owner or operator shall comply with the RACT determination for formaldehyde emissions.

**2. Monitoring** (Regulation 2.16, section 4.1.9.1.2)a. **NO<sub>x</sub>**

The owner or operator shall comply with the NO<sub>x</sub> RACT Plan attached to this permit.

b. **TAP**

The owner or operator shall have a written maintenance program. The owner or operator shall follow a routine operation and preventive maintenance program to ensure optimum engine performance.

**3. Record Keeping** (Regulation 2.16, section 4.1.9.2)a. **NO<sub>x</sub>**

The owner or operator shall comply with the NO<sub>x</sub> RACT Plan attached to this permit.

b. **TAP**

The owner or operator shall keep records of when maintenance is performed; who performed the maintenance; and what the maintenance entailed.

**4. Reporting** (Regulation 2.16, section 4.1.9.3)

The owner or operator shall clearly identify all deviations from permit requirements in the quarterly reports. All reports shall be certified by a responsible official as defined in Regulation 2.16, section 2.36. If no deviations occur in that reporting period then the owner or operator shall report a negative declaration for each of the following categories. The owner or operator shall report quarterly the following:

a. **NO<sub>x</sub>**



The owner or operator shall comply with the NO<sub>x</sub> RACT Plan reporting requirements attached to this permit.

b. **TAPs**

There are no compliance reporting requirements for this pollutant.

**Comment**

Additional Conditions 1.b, 2.b and 3.b are the RACT determination required for formaldehyde emissions from the engines and turbine by Regulation 5.11 and approved by the District.

**Emission Unit U5 Description:** Compressor Engine #5**Applicable Regulations:**

<b>Federally Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
6.42	Reasonably Available Control Technology Requirements for Major Volatile Organic Compound and Nitrogen Oxides Emitting Facilities	1, 2, 3, 4.3, 5

<b>District Only Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.11	Standards of Performance for Existing Sources Emitting Toxic Air Pollutants	1 through 6
5.14	Hazardous Air Pollutants and Source Categories	1, 2

**Allowable Emissions:**

<b>Pollutant</b>	<b>Limit/Standard</b>
NO <sub>x</sub>	See NO <sub>x</sub> RACT Plan, Regulation 6.42, section 4.3
TAP	< ASL, Regulation 5.11, Section 6

**Components:**

One engine (E5), rated capacity of 1500 bhp, installed in January, 1953. Vented out stack S5.

**Additional Conditions****1. Standards** (Regulation 2.16, section 4.1.1)a. **NO<sub>x</sub>** (Regulation 6.42, section 4.3)

The owner or operator shall comply with the NO<sub>x</sub> RACT Plan attached to this permit.

b. **TAP** (Regulation 5.11, section 6)

The owner or operator shall comply with the RACT determination for formaldehyde emissions.

**2. Monitoring** (Regulation 2.16, section 4.1.9.1.2)a. **NO<sub>x</sub>**

The owner or operator shall comply with the NO<sub>x</sub> RACT Plan attached to this permit.

b. **TAP**

The owner or operator shall have a written maintenance program. The owner or operator shall follow a routine operation and preventive maintenance program to ensure optimum engine performance.

**3. Record Keeping** (Regulation 2.16, section 4.1.9.2)a. **NO<sub>x</sub>**

The owner or operator shall comply with the NO<sub>x</sub> RACT Plan attached to this permit.

b. **TAP**

The owner or operator shall keep records of when maintenance is performed; who performed the maintenance; and what the maintenance entailed.

**4. Reporting** (Regulation 2.16, section 4.1.9.3)

The owner or operator shall clearly identify all deviations from permit requirements in the quarterly reports. All reports shall be certified by a responsible official as defined in Regulation 2.16, section 2.36. If no deviations occur in that reporting period then the owner or operator shall report a negative declaration for each of the following categories. The owner or operator shall report quarterly the following:

a. **NO<sub>x</sub>**

The owner or operator shall comply with the NO<sub>x</sub> RACT Plan reporting requirements attached to this permit.

b. **TAP**

There are no compliance reporting requirements for this pollutant.

**Comment**

Additional Conditions 1.b, 2.b and 3.b are the RACT determination required for formaldehyde emissions from the engines and turbine by Regulation 5.11 and approved by the District.

**Emission Unit U6 Description:** Compressor Engine #6**Applicable Regulations:**

<b>Federally Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
6.42	Reasonably Available Control Technology Requirements for Major Volatile Organic Compound and Nitrogen Oxides Emitting Facilities	1, 2, 3, 4.3, 5

<b>District Only Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.11	Standards of Performance for Existing Sources Emitting Toxic Air Pollutants	1 through 6
5.14	Hazardous Air Pollutants and Source Categories	1, 2

**Allowable Emissions:**

<b>Pollutant</b>	<b>Limit/Standard</b>
NO <sub>x</sub>	See NO <sub>x</sub> RACT Plan, Regulation 6.42, section 4.3
TAP	< ASL, Regulation 5.11, Section 6

**Components:**

One engine (E6), rated capacity of 1500 bhp, installed in January, 1953. Vented out stack S6.

**Additional Conditions****1. Standards** (Regulation 2.16, section 4.1.1)a. **NO<sub>x</sub>** (Regulation 6.42, section 4.3)

The owner or operator shall comply with the NO<sub>x</sub> RACT Plan attached to this permit.

b. **TAP** (Regulation 5.11, section 6)

The owner or operator shall comply with the RACT determination for formaldehyde emissions.

**2. Monitoring** (Regulation 2.16, section 4.1.9.1.2)a. **NO<sub>x</sub>**

The owner or operator shall comply with the NO<sub>x</sub> RACT Plan attached to this permit.

b. **TAP**

The owner or operator shall have a written maintenance program. The owner or operator shall follow a routine operation and preventive maintenance program to ensure optimum engine performance.

**3. Record Keeping** (Regulation 2.16, section 4.1.9.2)a. **NO<sub>x</sub>**

The owner or operator shall comply with the NO<sub>x</sub> RACT Plan attached to this permit.

b. **TAP**

The owner or operator shall keep records of when maintenance is performed; who performed the maintenance; and what the maintenance entailed.

**4. Reporting** (Regulation 2.16, section 4.1.9.3)

The owner or operator shall clearly identify all deviations from permit requirements in the quarterly reports. All reports shall be certified by a responsible official as defined in Regulation 2.16, section 2.36. If no deviations occur in that reporting period then the owner or operator shall report a negative declaration for each of the following categories. The owner or operator shall report quarterly the following:

a. **NO<sub>x</sub>**

The owner or operator shall comply with the NO<sub>x</sub> RACT Plan reporting requirements attached to this permit.

b. **TAP**

There are no compliance reporting requirements for this pollutant.

**Comment**

Additional Conditions 1.b, 2.b, and 3.b are the RACT determination required for formaldehyde emissions from the engines and turbine by Regulation 5.11 and approved by the District.

**Emission Unit U7 Description:** Compressor Engine #7**Applicable Regulations:**

<b>Federally Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
6.42	Reasonably Available Control Technology Requirements for Major Volatile Organic Compound and Nitrogen Oxides Emitting Facilities	1, 2, 3, 4.3, 5

<b>District Only Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.11	Standards of Performance for Existing Sources Emitting Toxic Air Pollutants	1 through 6
5.14	Hazardous Air Pollutants and Source Categories	1, 2

**Allowable Emissions:**

<b>Pollutant</b>	<b>Limit/Standard</b>
NO <sub>x</sub>	See NO <sub>x</sub> RACT Plan, Regulation 6.42, section 4.3
TAP	< ASL, Regulation 5.11, Section 6

**Components:**

One engine (E7), rated capacity of 1500 bhp, installed in December, 1956. Vented out stack S7.



**Additional Conditions****1. Standards** (Regulation 2.16, section 4.1.1)a. **NO<sub>x</sub>** (Regulation 6.42, section 4.3)

The owner or operator shall comply with the NO<sub>x</sub> RACT Plan attached to this permit.

b. **TAP** (Regulation 5.11, section 6)

The owner or operator shall comply with the RACT determination for formaldehyde emissions.

**2. Monitoring** (Regulation 2.16, section 4.1.9.1.2)a. **NO<sub>x</sub>**

The owner or operator shall comply with the NO<sub>x</sub> RACT Plan attached to this permit.

b. **TAP**

The owner or operator shall have a written maintenance program. The owner or operator shall follow a routine operation and preventive maintenance program to ensure optimum engine performance.

**3. Record Keeping** (Regulation 2.16, section 4.1.9.2)a. **NO<sub>x</sub>**

The owner or operator shall comply with the NO<sub>x</sub> RACT Plan attached to this permit.

b. **TAP**

The owner or operator shall keep records of when maintenance is performed; who performed the maintenance; and what the maintenance entailed.

**4. Reporting** (Regulation 2.16, section 4.1.9.3)

The owner or operator shall clearly identify all deviations from permit requirements in the quarterly reports. All reports shall be certified by a responsible official as defined in Regulation 2.16, section 2.36. If no deviations occur in that reporting period then the owner or operator shall report a negative declaration for each of the following categories. The owner or operator shall report quarterly the following:

a. **NO<sub>x</sub>**

The owner or operator shall comply with the NO<sub>x</sub> RACT Plan reporting requirements attached to this permit.

b. **TAP**

There are no compliance reporting requirements for this pollutant.

**Comment**

Additional Conditions 1.b, 2.b, and 3.b are the RACT determination required for formaldehyde emissions from the engines and turbine by Regulation 5.11 and approved by the District.

**Emission Unit U8 Description:** Compressor Engine #8**Applicable Regulations:**

<b>Federally Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
6.42	Reasonably Available Control Technology Requirements for Major Volatile Organic Compound and Nitrogen Oxides Emitting Facilities	1, 2, 3, 4.3, 5

<b>District Only Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.11	Standards of Performance for Existing Sources Emitting Toxic Air Pollutants	1 through 6
5.14	Hazardous Air Pollutants and Source Categories	1, 2

**Allowable Emissions:**

<b>Pollutant</b>	<b>Limit/Standard</b>
NO <sub>x</sub>	See NO <sub>x</sub> RACT Plan, Regulation 6.42, section 4.3
TAP	< ASL, Regulation 5.11, Section 6

**Components:**

One engine (E8), rated capacity of 1500 bhp, installed in October, 1962. Vented out stack S8.

**Additional Conditions****1. Standards** (Regulation 2.16, section 4.1.1)a. **NO<sub>x</sub>** (Regulation 6.42, section 4.3)

The owner or operator shall comply with the NO<sub>x</sub> RACT Plan attached to this permit.

b. **TAP** (Regulation 5.11, section 6)

The owner or operator shall comply with the RACT determination for formaldehyde emissions.

**2. Monitoring** (Regulation 2.16, section 4.1.9.1.2)a. **NO<sub>x</sub>**

The owner or operator shall comply with the NO<sub>x</sub> RACT Plan attached to this permit.

b. **TAP**

The owner or operator shall have a written maintenance program. The owner or operator shall follow a routine operation and preventive maintenance program to ensure optimum engine performance.

**3. Record Keeping** (Regulation 2.16, section 4.1.9.2)a. **NO<sub>x</sub>**

The owner or operator shall comply with the NO<sub>x</sub> RACT Plan attached to this permit.

b. **TAP**

The owner or operator shall keep records of when maintenance is performed; who performed the maintenance; and what the maintenance entailed.

**4. Reporting** (Regulation 2.16, section 4.1.9.3)

The owner or operator shall clearly identify all deviations from permit requirements in the quarterly reports. All reports shall be certified by a responsible official as defined in Regulation 2.16, section 2.36. If no deviations occur in that reporting period then the owner or operator shall report a negative declaration for each of the following categories. The owner or operator shall report quarterly the following:

a. **NO<sub>x</sub>**

The owner or operator shall comply with the NO<sub>x</sub> RACT Plan reporting requirements attached to this permit.

b. **TAP**

There are no compliance reporting requirements for this pollutant.

**Comment**

Additional Conditions 1.b, 2.b, and 3.b are the RACT determination required for formaldehyde emissions from the engines and turbine by Regulation 5.11 and approved by the District.

**Emission Unit U9 Description:** Compressor Engine #9**Applicable Regulations:**

<b>Federally Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
6.42	Reasonably Available Control Technology Requirements for Major Volatile Organic Compound and Nitrogen Oxides Emitting Facilities	1, 2, 3, 4.3, 5

<b>District Only Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.11	Standards of Performance for Existing Sources Emitting Toxic Air Pollutants	1 through 6
5.14	Hazardous Air Pollutants and Source Categories	1, 2

**Allowable Emissions:**

<b>Pollutant</b>	<b>Limit/Standard</b>
NO <sub>x</sub>	See NO <sub>x</sub> RACT Plan, Regulation 6.42, section 4.3
TAP	< ASL, Regulation 5.11, Section 6

**Components:**

One engine (E9), rated capacity of 1500 bhp, installed in September, 1963. Vented out stack S9.

**Additional Conditions****1. Standards** (Regulation 2.16, section 4.1.1)a. **NO<sub>x</sub>** (Regulation 6.42, section 4.3)

The owner or operator shall comply with the NO<sub>x</sub> RACT Plan attached to this permit.

b. **TAP** (Regulation 5.11, section 6)

The owner or operator shall comply with the RACT determination for formaldehyde emissions.

**2. Monitoring** (Regulation 2.16, section 4.1.9.1.2)a. **NO<sub>x</sub>**

The owner or operator shall comply with the NO<sub>x</sub> RACT Plan attached to this permit.

b. **TAP**

The owner or operator shall have a written maintenance program. The owner or operator shall follow a routine operation and preventive maintenance program to ensure optimum engine performance.

**3. Record Keeping** (Regulation 2.16, section 4.1.9.2)a. **NO<sub>x</sub>**

The owner or operator shall comply with the NO<sub>x</sub> RACT Plan attached to this permit.

b. **TAP**

The owner or operator shall keep records of when maintenance is performed; who performed the maintenance; and what the maintenance entailed.

**4. Reporting** (Regulation 2.16, section 4.1.9.3)

The owner or operator shall clearly identify all deviations from permit requirements in the quarterly reports. All reports shall be certified by a responsible official as defined in Regulation 2.16, section 2.36. If no deviations occur in that reporting period then the owner or operator shall report a negative declaration for each of the following categories. The owner or operator shall report quarterly the following:

a. **NO<sub>x</sub>**

The owner or operator shall comply with the NO<sub>x</sub> RACT Plan reporting requirements attached to this permit.

b. **TAP**

There are no compliance reporting requirements for this pollutant.

**Comment**

Additional Conditions 1.b, 2.b, and 3.b are the RACT determination required for formaldehyde emissions from the engines and turbine by Regulation 5.11 and approved by the District.



**Emission Unit U13 Description:** Compressor Turbine T-1**Applicable Regulations:**

<b>Federally Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
6.09	Standards of Performance for Existing Process Operations	1, 2, 3.1, 5
6.42	Reasonably Available Control Technology Requirements for Major Volatile Organic Compound and Nitrogen Oxides Emitting Facilities	1, 2, 3, 4.3, 5

<b>District Only Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.11	Standards of Performance for Existing Sources Emitting Toxic Air Pollutants	1 through 6
5.14	Hazardous Air Pollutants and Source Categories	1, 2

**Allowable Emissions:**

<b>Pollutant</b>	<b>Limit/Standard</b>
Opacity	20%, Regulation 6.09, section 3.1
NO <sub>x</sub>	See NO <sub>x</sub> RACT Plan, Regulation 6.42, section 4.3
TAP	< ASL, Regulation 5.11, Section 6

**Components:**

One turbine (E13), rated capacity of 12,090 bhp (determined, using National Electrical Manufacturing Association conditions ), installed in November, 1969. Vented out stack S13.

One lube oil sump vent mist eliminator (E14), C1, maximum capacity of 1000 SCFM, installed on 8 November 1993 to control mist out of stack S14.

**Additional Conditions****1. Standards** (Regulation 2.16, section 4.1.1)a. **NO<sub>x</sub>** (Regulation 6.42, section 4.3)

The owner or operator shall comply with the NO<sub>x</sub> RACT Plan attached to this permit.

b. **TAP** (Regulation 5.11, section 6)

The owner or operator shall comply with the RACT determination for formaldehyde emissions.

c. **Opacity** (Regulation 6.09, sections 3.1)

The owner or operator shall not allow or cause the opacity from emission point E-14 to exceed 20%.

**2. Monitoring** (Regulation 2.16, section 4.1.9.1.2)a. **NO<sub>x</sub>**

The owner or operator shall comply with the NO<sub>x</sub> RACT Plan attached to this permit.

b. **TAP**

The owner or operator shall have a written maintenance program. The owner or operator shall follow a routine operation and preventive maintenance program to ensure optimum engine performance.

c. **Opacity**

The owner or operator shall:

- i. Conduct a weekly one-minute visible emissions survey of emission point 14, during normal operation and daylight hours.
- ii. For Emission Points without observed visible emissions during twelve consecutive weeks, the owner or operator may elect to conduct a monthly one-minute visible emission survey, during normal operation and daylight hours.
- iii. At Emission Points where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9 for emissions within 24

hours of the initial observation. If the opacity standard is exceeded, the owner or operator shall report the exceedance to the District, pursuant to Regulation 1.07, and take all practicable steps to eliminate the exceedance. Subsequent visible emission surveys shall be conducted as indicated in item 2.c.i.

**3. Record Keeping** (Regulation 2.16, section 4.1.9.2)

a. **NO<sub>x</sub>**

The owner or operator shall comply with the NO<sub>x</sub> RACT Plan attached to this permit.

b. **TAP**

The owner or operator shall keep records of when maintenance is performed; who performed the maintenance; and what the maintenance entailed.

c. **Opacity**

The owner or operator shall maintain records of the results of all visible emission surveys and tests performed shall be maintained and shall include the date and time of the survey; the name of the person conducting the survey; and whether visible emissions were observed. If an Emission Point is not being operated during a given week (or month, as appropriate), then no visible emission survey needs to be performed and a negative declaration may be entered in the record.

**4. Reporting** (Regulation 2.16, section 4.1.9.3)

The owner or operator shall clearly identify all deviations from permit requirements in the quarterly reports. All reports shall be certified by a responsible official as defined in Regulation 2.16, section 2.36. If no deviations occur in that reporting period then the owner or operator shall report a negative declaration for each of the following categories. The owner or operator shall report quarterly the following:

a. **NO<sub>x</sub>**

The owner or operator shall comply with the NO<sub>x</sub> RACT Plan reporting requirements attached to this permit.

b. **TAP**

There are no compliance reporting requirements for this pollutant.

c. **Opacity**

i. Emission Unit ID number and Stack ID number

- ii. The beginning and ending date of the reporting period
- iii. The date, time, and results of each Method 9 conducted
- iv. Description of any corrective action taken

**Comment**

Additional Conditions 1.b., 2.b., and 3.b. are the RACT determination required for formaldehyde emissions from the engines and turbine by Regulation 5.11 and approved by the District.

**Emission Unit U16 Description:** Ethylene Glycol Storage Tank**Applicable Regulations:**

<b>Federally Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
6.13	Standard of Performance for Existing Storage Vessels for Volatile Organic Compounds	1, 2, 3.3

<b>District Only Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.11	Standards of Performance for Existing Sources Emitting Toxic Air Pollutants	1 through 6
5.14	Hazardous Air Pollutants and Source Categories	1, 2

**Allowable Emissions:**

<b>Pollutant</b>	<b>Limit/Standard</b>
VOC	<1.5 psia materials stored, Regulation 6.13, section 3.3
TAP	< ASL, Regulation 5.11, Section 6

**Components:**

One Ethylene Glycol storage tank (E17), capacity 2727 gallons, installed in November, 1969.

**Additional Conditions****1. Standards** (Regulation 2.16, section 4.1.1)a. **VOC** (Regulation 6.13, section 3.3)

The owner or operator shall not store anything other than ethylene glycol in this tank, there by not exceeding a vapor pressure of materials stored, of < 1.5 psia.

b. **TAP** (Regulation 5.11, section 6)

The owner or operator shall maintain emissions below the calculated ASL, unless modeling, RACT, or BACT is performed.

**2. Monitoring** (Regulation 2.16, section 4.1.9.1.2)a. **VOC**

The owner or operator shall demonstrate compliance by maintaining records of the materials stored in this storage tank.

b. **TAP**

The owner or operator shall demonstrate compliance by maintaining records of the materials stored in this storage tank.

**3. Record Keeping** (Regulation 2.16, section 4.1.9.2)a. **VOC**

The owner or operator shall maintain records of the material stored in this tank.

b. **TAP**

The owner or operator shall maintain records of the material stored in this tank.

**4. Reporting** (Regulation 2.16, section 4.1.9.3)

The owner or operator shall clearly identify all deviations from permit requirements in the quarterly reports. All reports shall be certified by a responsible official as defined in Regulation 2.16, section 2.36. If no deviations occur in that reporting period then the owner or operator shall report a negative declaration for each of the following categories. The owner or operator shall report quarterly the following:

a. **VOC**

- i. Emission Unit ID number and Emission point ID number
  - ii. The beginning and ending date of the reporting period
  - iii. Identification of materials stored during the reporting period
  - iv. Any variance from the permitted materials allowed
- b. **TAP**

There are no compliance reporting requirements for this pollutant.

**Comment**

Because the vapor pressure of the materials stored is below 1.5 psia, this facility is exempt from section 3.3 of Regulation 6.13.

**Emission Unit U17 Description:** Portable Pipeline Distillate Tank**Applicable Regulations:**

<b>Federally Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
7.12	Standards of Performance for New Storage Vessels for Volatile Organic Compounds	1, 2, 3.3

<b>District Only Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.11	Standards of Performance for Existing Sources Emitting Toxic Air Pollutants	1 through 6
5.14	Hazardous Air Pollutants and Source Categories	1, 2

**Allowable Emissions:**

<b>Pollutant</b>	<b>Limit/Standard</b>
VOC	<1.5 psia materials stored, Regulation 7.12, section 3.3
TAP	< ASL, Regulation 5.11, Section 6

**Component:**

One Portable Pipeline Distillate storage tank (E18), capacity 560 gallons, installed in August, 1979.



**Additional Conditions****1. Standards** (Regulation 2.16, section 4.1.1)a. **VOC** (Regulation 7.12, section 3.3)

The owner or operator shall not store anything other than petroleum distillate in this tank, there by not exceeding a vapor pressure of materials stored, of < 1.5 psia.

b. **TAP** (Regulation 5.11, section 6)

The owner or operator shall maintain emissions below the calculated ASL, unless modeling, RACT, or BACT is performed.

**2. Monitoring** (Regulation 2.16, section 4.1.9.1.2)a. **VOC**

The owner or operator shall demonstrate compliance by maintaining records of the materials stored in this storage tank.

b. **TAP**

The owner or operator shall demonstrate compliance by maintaining records of the materials stored in this storage tank.

**3. Record Keeping** (Regulation 2.16, section 4.1.9.2)a. **VOC**

The owner or operator shall maintain records of the material stored in this tank.

b. **TAP**

The owner or operator shall maintain records of the material stored in this tank.

**4. Reporting** (Regulation 2.16, section 4.1.9.3)

The owner or operator shall clearly identify all deviations from permit requirements in the quarterly reports. All reports shall be certified by a responsible official as defined in Regulation 2.16, section 2.36. If no deviations occur in that reporting period then the owner or operator shall report a negative declaration for each of the following categories. The owner or operator shall report quarterly the following:

a. **VOC**

- i. Emission Unit ID number and Emission point ID number
  - ii. The beginning and ending date of the reporting period
  - iii. Identification of materials stored during the reporting period
  - iv. Any variance from the permitted materials allowed
- b. **TAP**

There are no compliance reporting requirements for this pollutant.

**Comment**

Because the vapor pressure of the materials stored is below 1.5 psia, this facility is exempt from section 3.3 of Regulation 7.12.

**Emission Unit U18 Description:** Portable Station Maintenance Tank**Applicable Regulations:**

<b>Federally Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
7.12	Standards of Performance for New Storage Vessels for Volatile Organic Compounds	1, 2, 3.3

<b>District Only Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.11	Standards of Performance for Existing Sources Emitting Toxic Air Pollutants	1 through 6
5.14	Hazardous Air Pollutants and Source Categories	1, 2

**Allowable Emissions:**

<b>Pollutant</b>	<b>Limit/Standard</b>
VOC	<1.5 psia materials stored, Regulation 7.12, section 3.3
TAP	< ASL, Regulation 5.11, Section 6

**Component:**

One Portable Station Maintenance Ethylene Glycol or lubricating oil storage tank (E19), capacity 430 gallons.

**Additional Conditions****1. Standards** (Regulation 2.16, section 4.1.1)a. **VOC** (Regulation 7.12, section 3.3)

The owner or operator shall not store anything other than ethylene glycol or lubricating in this tank, there by not exceeding a vapor pressure of materials stored, of < 1.5 psia.

b. **TAP** (Regulation 5.11, section 6)

The owner or operator shall maintain emissions below the calculated ASL, unless modeling, RACT, or BACT is performed.

**2. Monitoring** (Regulation 2.16, section 4.1.9.1.2)a. **VOC**

The owner or operator shall demonstrate compliance by maintaining records of the materials stored in this storage tank.

b. **TAP**

The owner or operator shall demonstrate compliance by maintaining records of the materials stored in this storage tank.

**3. Record Keeping** (Regulation 2.16, section 4.1.9.2)a. **VOC**

The owner or operator shall maintain records of the material stored in this tank.

b. **TAP**

The owner or operator shall maintain records of the material stored in this tank.

**4. Reporting** (Regulation 2.16, section 4.1.9.3)

The owner or operator shall clearly identify all deviations from permit requirements in the quarterly reports. All reports shall be certified by a responsible official as defined in Regulation 2.16, section 2.36. If no deviations occur in that reporting period then the owner or operator shall report a negative declaration for each of the following categories. The owner or operator shall report quarterly the following:

a. **VOC**

- i. Emission Unit ID number and Emission point ID number
  - ii. The beginning and ending date of the reporting period
  - iii. Identification of materials stored during the reporting period
  - iv. Any variance from the permitted materials allowed
- b. **TAP**

There are no compliance reporting requirements for this pollutant.

**Comment**

Because the vapor pressure of the materials stored is below 1.5 psia, this facility is exempt from section 3.3 of Regulation 7.12.

**Emission Unit U19 Description:** Pipeline Distillate Tank**Applicable Regulations:**

<b>Federally Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
7.12	Standards of Performance for New Storage Vessels for Volatile Organic Compounds	1, 2, 3.3

<b>District Only Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.12	Standards of Performance for Existing Sources Emitting Toxic Air Pollutants	1 through 6
5.14	Hazardous Air Pollutants and Source Categories	1, 2

**Allowable Emissions:**

<b>Pollutant</b>	<b>Limit/Standard</b>
VOC	<1.5 psia materials stored, Regulation 7.12, section 3.3
TAP	< ASL, Regulation 5.12, Section 5

**Component:**

One Pipeline Distillate storage tank (E20), capacity 4400 gallons, installed in 1996.

**Additional Conditions****1. Standards** (Regulation 2.16, section 4.1.1)a. **VOC** (Regulation 7.12, section 3.3)

The owner or operator shall not store anything other than petroleum distillate in this tank, there by not exceeding a vapor pressure of materials store, of < 1.5 psia.

b. **TAP** (Regulation 5.12, section 5)

The owner or operator shall maintain emissions below the calculated ASL, unless modeling, RACT, or BACT is performed.

**2. Monitoring** (Regulation 2.16, section 4.1.9.1.2)a. **VOC**

The owner or operator shall demonstrate compliance by maintaining records of the materials stored in this storage tank.

b. **TAP**

The owner or operator shall demonstrate compliance by maintaining records of the materials stored in this storage tank.

**3. Record Keeping** (Regulation 2.16, section 4.1.9.2)a. **VOC**

The owner or operator shall maintain records of the material stored in this tank.

b. **TAP**

The owner or operator shall maintain records of the material stored in this tank.

**4. Reporting** (Regulation 2.16, section 4.1.9.3)

The owner or operator shall clearly identify all deviations from permit requirements in the quarterly reports. All reports shall be certified by a responsible official as defined in Regulation 2.16, section 2.36. If no deviations occur in that reporting period then the owner or operator shall report a negative declaration for each of the following categories. The owner or operator shall report quarterly the following:

a. **VOC**

- i. Emission Unit ID number and Emission point ID number
  - ii. The beginning and ending date of the reporting period
  - iii. Identification of materials stored during the reporting period
  - iv. Any variance from the permitted materials allowed
- b. **TAP**

There are no compliance reporting requirements for this pollutant.

**Comment**

Because the vapor pressure of the materials stored is below 1.5 psia, this facility is exempt from section 3.3 of Regulation 7.12.



**Emission Unit U20 Description:** New Emergency Generator**Applicable Regulations:**

<b>Federally Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
6.42	Reasonably Available Control Technology Requirements for Major Volatile Organic Compound and Nitrogen Oxides Emitting Facilities	1, 2, 3, 4.3, 5

<b>District Only Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.12	Standards of Performance for New or Modified Sources Emitting Toxic Air Pollutants	1, 2, 3, 4, 5
5.14	Hazardous Air Pollutants and Source Categories	1, 2

**Allowable Emissions:**

<b>Pollutant</b>	<b>Limit/Standard</b>
NO <sub>x</sub>	1500 hrs/year
NO <sub>x</sub>	See NO <sub>x</sub> RACT Plan, Regulation 6.42, section 4.3
TAP	< ASL, Regulation 5.12, Section 5

**Component:**

One generator (E21), maximum rated capacity of 800 bhp, installed in November, 1997. Vented out stack S21.

**Additional Conditions****1. Standards** (Regulation 2.16, section 4.1.1)**a. NO<sub>x</sub>** (Regulation 6.42, sect. 4.3)

- i. The owner or operator shall comply with the NO<sub>x</sub> RACT Plan attached to this permit.
- ii. The owner or operator shall not run this unit for more than 1500 hours during any consecutive twelve month period.

**b. TAP** (Regulation 5.12, Section 5)

The owner or operator shall comply with the BACT determination for formaldehyde emissions.

**2. Monitoring** (Regulation 2.16, section 4.1.9.1.2)**a. NO<sub>x</sub>**

- i. The owner or operator shall comply with the NO<sub>x</sub> RACT Plan attached to this permit.
- ii. The owner or operator shall maintain an operable hour meter on this unit.

**b. TAP**

The owner or operator shall have a written maintenance program. The owner or operator shall follow a routine operation and preventive maintenance program to ensure optimum engine performance.

**3. Record Keeping** (Regulation 2.16, section 4.1.9.2)**a. NO<sub>x</sub>**

- i. The owner or operator shall comply with the NO<sub>x</sub> RACT Plan attached to this permit.
- ii. The owner or operator shall record the hour usage of this unit, on a monthly basis.

**b. TAP**

The owner or operator shall keep records of when maintenance is performed; who performed the maintenance; and what the maintenance entailed.

**4. Reporting** (Regulation 2.16, section 4.1.9.3)

The owner or operator shall clearly identify all deviations from permit requirements in the quarterly reports. All reports shall be certified by a responsible official as defined in Regulation 2.16, section 2.36. If no deviations occur in that reporting period then the owner or operator shall report a negative declaration for each of the following categories. The owner or operator shall report quarterly the following:

**a. NO<sub>x</sub>**

- i. The owner or operator shall comply with the NO<sub>x</sub> RACT Plan reporting requirements attached to this permit, also;
- ii. Emission Unit ID number and Emission point ID number;
- iii. The beginning and ending date of the reporting period;
- iv. Identification of exceedances of the yearly operating hours for the emission point including the quantity of excess operating hours.

**b. TAP**

There are no compliance reporting requirements for this pollutant.

**Comments**

1. Additional Conditions 1.b, 2.b, and 3.b are the BACT determination required for formaldehyde emissions from the engines and turbine by Regulation 5.12 and approved by the District.
2. The company took the hours of operation limit in order to avoid the requirement in Regulation 2.08, that any new facility constructed, with an annual emission rate of more than 5 tpy, shall be required to obtain and pay for a construction permit.

**NO<sub>x</sub> RACT Plan - Amendment 1**

1. The oxides of nitrogen (NO<sub>x</sub>, expressed as NO<sub>2</sub>) emissions from each of Internal Combustion (IC) Engines #1 through #9 shall not exceed 3 grams per brake-horsepower-hour (g/bhp-hr), according to the following schedule:
  - A. Four IC engines by no later than November 15, 2001, and
  - B. Five IC engines by no later than November 15, 2002.

Until an individual IC engine is subject to the 3 g/bhp-hr NO<sub>x</sub> emissions limit, Texas Gas Transmission (Texas Gas) shall restrict the operation of that IC engine to less than or equal to 1350 brake horsepower during the time period of May 1 through September 30 each year.
2. Until October 1, 2004, the NO<sub>x</sub> (expressed as NO<sub>2</sub>) emissions from Turbine T-1 shall not exceed 100 pounds per hour. Additionally, the exhaust temperature for Turbine T-1 shall not exceed 1006 EF. On and after October 1, 2004, the NO<sub>x</sub> (expressed as NO<sub>2</sub>) emissions from Turbine T-1 shall not exceed 75 parts per million by volume on a dry gas basis (ppmvd) corrected to 15% O<sub>2</sub>. Additionally, Texas Gas shall comply with the following schedule for Turbine T-1:
 

A.	Submit application for construction permit for Dry Low NO <sub>x</sub> (DLN) controls	3-1-03
B.	Place order for DLN controls	6-1-03
C.	Begin installation of DLN controls	6-1-04
D.	Begin operation of DLN controls	10-1-04
E.	Conduct NO <sub>x</sub> performance test for Turbine T-1	12-1-04
F.	Submit performance test results to the District	1-15-05
3. The NO<sub>x</sub> (expressed as NO<sub>2</sub>) emissions from the Emergency Generator Engine shall not exceed 2.6 grams per brake horsepower-hour.
4. Texas Gas shall monitor and record the following information:
  - A. For each IC engine until it is subject to the 3 g/bhp-hr NO<sub>x</sub> emissions limit:
    - (1) The daily hours of operation, and
    - (2) The brake horsepower every 4 hours,
  - B. For each IC engine after it is subject to the 3 g/bhp-hr NO<sub>x</sub> emissions limit, the following parameters:
    - (1) Engine speed,
    - (2) Engine load,
    - (3) Fuel gas flow,
    - (4) Air manifold temperature,
    - (5) Air manifold pressure, and
    - (6) Ignition timing,
  - C. For Turbine T-1 until October 1, 2004:
    - (1) The daily hours of operation,
    - (2) The brake horsepower every 4 hours, and
    - (3) The exhaust temperature every 4 hours, except that the requirement to record the exhaust temperature shall begin January 15, 2001,
  - D. For Turbine T-1 on and after October 1, 2004, the combustion characteristic parameters as determined appropriate by the District. The monitoring plan

approved by the District shall be subject to EPA review and approval and shall be incorporated into a Title V Operating Permit pursuant to the provisions of NO<sub>x</sub> RACT Plan Element (Element) No. 8, and

E. For the Emergency Generator Engine:

(1) The weekly hours of operation.

Texas Gas shall record all periods when the required information in this Element was not available, the reason for the loss of data, and any corrective actions taken to resolve the problem. Each record shall be maintained for a minimum of 5 years and made available to the Air Pollution Control District (District) upon request.

5. Texas Gas shall conduct NO<sub>x</sub> performance tests for the equipment identified in this Element according to the following schedule:

- A. Each year, one IC engine from the group of IC Engines #1 through #6. Testing of the engines shall be alternated such that each IC engine in this group has been tested in a six-year period,
- B. Each year, one IC engine from the group of IC Engines #7 through #9. Testing of the engines shall be alternated such that each IC engine in this group has been tested in a three-year period, and
- C. Each year starting in 2005, Turbine T-1.

If the requirements of Regulation 6.42 *Reasonably Available Control Technology Requirements for Major Volatile Organic Compound- and Nitrogen Oxides-Emitting Facilities* section 5.1 are met, and subject to the annual performance test schedule reinstitution provision, performance testing for the Turbine T-1 may be done on a biennial schedule.

6. Performance testing shall meet the following requirements:

- A. Emissions concentrations and the mass determinations shall be obtained using Reference Methods of 40 CFR Part 60 Appendix A. The following methods shall be used:
  - (1) Method 1 or 1A, which furnishes guidance in site and traverse selection for sampling velocity at traverse points in stationary sources,
  - (2) Method 2, 2A, 2B, 2C, 2D, 2E, 2F, 2G, or 2H, which applies to measurements of gas volumetric flow rates,
  - (3) Method 3, 3A, 3B, or 3C, which is applicable for determining the concentrations of one or more of the following gases: carbon dioxide, oxygen (O<sub>2</sub>), carbon monoxide, nitrogen, and methane,
  - (4) Method 4, which determines the moisture content in stack gases, and
  - (5) Method 7, 7A, 7B, 7C, 7D, or 7E, which provides the analytical method for determining the concentration of NO<sub>x</sub> emissions from stationary sources.
- B. The use of other Reference Methods that are added to 40 CFR Part 60 Appendix A, alternative tests, or modifications to the Reference Methods listed in Element No. 6.A. may be proposed by Texas Gas as part of the testing plan required by Element No. 6.D. Such methods may be used if approved in writing by the District.
- C. Performance testing shall meet the requirements of Regulation 1.04 *Performance Tests* that are not addressed in this Element.

- D. A notification of intent to conduct a performance test shall be submitted to the District at least 25 working days in advance of the projected starting date for the performance test. The notification shall include the proposed test methods to be used.
  - E. If a pre-test conference to discuss the proposed test methods is deemed necessary by the District, a pre-test conference shall be arranged by District personnel.
  - F. At least 10 working days' prior notice of the scheduled starting date for the performance test shall be provided to the District.
  - G. A performance test report shall be submitted to the District within 60 days of completion of performance testing. The report shall include the calculations used to determine emissions. The NO<sub>x</sub> emission rate for each emissions unit for which performance testing is required in Element No. 5 shall be expressed in pounds per hour and grams per brake horsepower-hour. The NO<sub>x</sub> emission rate for the Turbine T-1 shall also be expressed in parts per million by volume on a dry gas basis, corrected to 15% O<sub>2</sub>. The raw data shall be retained by Texas Gas for a minimum of 5 years and made available to the District upon request. Selected portions of the raw data used to calculate the emissions shall be included in the report in a format provided by the District.
7. Texas Gas shall keep a record identifying all deviations from the requirements of this NO<sub>x</sub> RACT Plan and shall submit to the District a written report of all deviations that occurred during the preceding semi-annual period. Semi-annual periods shall run from January 1 to June 30 and July 1 to December 31. The report shall contain the following information:
- A. The equipment designation,
  - B. The beginning and ending date of the reporting period,
  - C. Identification of all periods during which a deviation occurred, including the loss of data as required by Element No. 4,
  - D. A description, including the magnitude, of the deviation,
  - E. If known, the cause of the deviation, and
  - F. A description of all corrective actions taken to abate the deviation.
- If no deviation occurred during the semi-annual period, the report shall contain a negative declaration. The report shall also include a progress update regarding the installation of control equipment to meet the final emission limits in Elements No. 1 and 2. Each report shall be submitted within 60 days following the end of the semi-annual period.
8. In lieu of the requirements in this NO<sub>x</sub> RACT Plan, Texas Gas may comply with alternative requirements regarding emission limitations, equipment operation, test methods, monitoring, recordkeeping, or reporting, provided the following conditions are met:
- A. The alternative requirements are established and incorporated into an operating permit pursuant to a Title V Operating Permit issuance, renewal, or significant permit revision process as established in Regulation 2.16,
  - B. The alternative requirements are consistent with the streamlining procedures and guidelines set forth in section II.A. of *White Paper Number 2 for Improved Implementation of the Part 70 Operating Permits Program*, March 5, 1996, U.S. Environmental Protection Agency, Office of Air Quality Planning and Standards. The overall effect of compliance with alternative

requirements shall consider the effect on an intrinsic basis, such as grams per brake horsepower-hour,

- C. The U.S. Environmental Protection Agency (EPA) has not objected to the issuance, renewal, or revision of the Title V Operating Permit, and either
- D. If the public comment period preceded the EPA review period, then the District had transmitted any public comments concerning the alternative requirements to EPA with the proposed permit, or
- E. If the EPA and public comment periods ran concurrently, then the District had transmitted any public comments concerning the alternative requirements to EPA no later than 5 working days after the end of the public comment period.

The District's determination of approval of any alternative requirements is not binding on EPA. Noncompliance with any alternative requirement established pursuant to the Title V Operating Permit process constitutes a violation of this NO<sub>x</sub> RACT Plan.

### Permit Shield

The owner or operator is hereby granted a permit shield that shall apply as long as the owner or operator demonstrates ongoing compliance with all the conditions of this permit. Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements of the regulations cited in this permit as of the date of issuance per District Regulation 2.16, section 4.6.1.1.

### Off-Permit Documents

There are no off-permit documents associated with this Title V permit.

### Alternative Operating Scenario

The company requested no alternative operating scenario in its Title V application.

Source-Wide HAP Speciation	
Pollutant	CAS #
Formaldehyde	50-00-0

Insignificant Activities		
Description	Basis	Quantity
Gasoline storage tank ( 238 gal )	Reg 2.02, sec 2.3.24	1
Pipeline fluid tank ( 56 gal )	Reg 2.02, sec 2.3.24	1
Fuel oil storage tanks ( 300 and 260 gal )	Reg 2.02, sec 2.3.9.2	2
Lubricating oil storage tanks	Reg 2.02, sec 2.3.9.2	5
Combustion sources <10MMbtu/hr	Reg 2.02, sec 2.1.1	20
Non-halogenated cold solvent parts cleaners with secondary reservoir *	Reg 2.02, sec 2.3.22	2
Internal combustion engines	Reg 2.02, sec 2.2	Various
Brazing, soldering or welding equipment	Reg 2.02, sec 2.3.4	Various
Emergency relief vents	Reg 2.02, sec 2.3.10	Various
Residential/domestic equipment	Reg 2.02, sec 2.3.16	Various



1. Insignificant Activities are only those activities or processes falling into the general categories defined in Regulation 2.02, Section 2, and not associated with a specific operation or process for which there is a specific regulation. Equipment associated with a specific operation or process (Emission Unit) shall be listed with the specific process even though there may be no applicable requirements. Information contained in the permit and permit summary shall clearly indicate that those items identified with negligible emissions have no applicable requirements.
  2. Activities identified In Regulation 2.02, Section 2, may not require a permit and may be insignificant with regard to application disclosure requirements but may still have generally applicable requirements that continue to apply to the source and must be included in the Title V permit.
- \*
- a. Non-halogenated cold solvent parts cleaners shall be operated in compliance with all applicable sections of Regulations 6.18 and 7.18, including Section 4 of each.
  - b. No facility, having been designated as an insignificant activity, shall be exempt from any generally applicable requirements which shall include a 20% opacity limit for facilities not otherwise regulated.
  - c. No periodic monitoring shall be required for facilities designated as insignificant activities.